U.S. Environmental Protection Agency
Office of Waste Programs Enforcement
Contract No. 68-W9-0006

**PRELIMINARY ASSESSMENT/
VISUAL SITE INSPECTION**

**ACCRA PAC, INC.
ELKHART, INDIANA
IND 042 080 614**

FINAL REPORT

TES 9

Technical Enforcement Support at Hazardous Waste Sites Zone III Regions 5,6, and 7

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FINAL REPORT

Prepared for

U.S. ENVIRONMENTAL PROTECTION AGENCY
Office of Waste Programs Enforcement
Washington, DC 20460

Work Assignment No.	:	R05032
EPA Region	:	5
Site No.	:	IND 042 080 614
Date Prepared	:	February 3, 1992
Contract No.	:	68-W9-0006
PRC No.	:	109-R05032IN01
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EXECUTIVE SUMMARY

PRC Environmental Management, Inc. (PRC), performed a preliminary assessment and visual site inspection (PA/VSI) to identify and assess the existence and likelihood of releases from solid waste management units (SWMU) and other areas of concern (AOC) at the Accra Pac, Inc. (Accra Pac), facility in Elkhart, Indiana. This report summarizes the results of the PA/VSI and evaluates the potential for releases of hazardous wastes or hazardous constituents from the SWMUs and AOCs identified.

Accra Pac processes and packages household, automotive, and personal-care products. Facility operations began at its current location in 1978. The facility presently covers 8.9 acres in an industrial park and employs 290 people. Accra Pac generates two hazardous waste streams: spent halogenated solvents (F002), and materials and products not meeting client's specifications (D001). In 1985, Accra Pac completed RCRA closure of its drum storage area and changed in status from a treatment, storage, or disposal (TSD) facility to large-quantity generator of hazardous waste.

The PA/VSI identified the following five SWMUs and one AOC at the facility:

Solid Waste Management Units

1. Underground Waste Storage Tanks
2. Aerosol Can Shredder with Drum Storage Area
3. Trash Compactor
4. Former Drum Storage Area
5. Evaporator Pits

Areas of Concern

1. Underground Raw Chemical Storage Tanks

The potential for releases to soil, ground water, or surface water from SWMUs currently operating at the facility (SWMUs 1, 2, and 3) is low. SWMUs 1 and 3 are not used to manage hazardous waste and SWMU 2 has sound secondary containment. SWMUs 4 and 5 are inactive; therefore, the potential for release to environmental media from these units is minimal. The potential for release to environmental media for AOC 1 is moderate given the age of the underground tanks; however, the tanks are planned for removal in the next 12 to 18 months.

Receptors of potential releases at the facility include Accra Pac employees and residents of Elkhart. A fence surrounding the facility limits access by potential receptors. Sensitive

environments in the area include the St. Joseph River and its wetlands, both of which are 0.7 mile north of the facility.

Drinking water for the area comes from wells. The City of Elkhart operates four well fields located west of the facility. The nearest well field is about three miles to the southwest of the facility. Many residents near the Accra Pac facility receive their drinking water from private wells.

The propellent releases to the air from aerosol can shredding unit (SWMU 2) should be monitored to determine the potential for air contamination. Removal action of the underground raw chemical storage tanks (A0C 1) should be monitored and soil samples collected to determine contamination level.

1.0 INTRODUCTION

PRC Environmental Management, Inc. (PRC), received Work Assignment No. R05032 from the U.S. Environmental Protection Agency (EPA) under Contract No. 68-W9-0006 (TES 9) to conduct preliminary assessments (PA) and visual site inspections (VSI) of hazardous waste treatment and storage facilities in Region 5.

As part of the EPA Region 5 Environmental Priorities Initiative, the RCRA and CERCLA programs are working together to identify and address RCRA facilities that have a high priority for corrective action using applicable RCRA and CERCLA authorities. The PA/VSI is the first step in the process of prioritizing facilities for corrective action. Through the PA/VSI process, enough information is obtained to characterize a facility's actual or potential releases to the environment from solid waste management units (SWMU) and areas of concern (AOC).

A SWMU is defined as any discernible unit at a RCRA facility in which solid wastes have been placed and from which hazardous constituents might migrate, regardless of whether the unit was intended to manage solid or hazardous waste.

The SWMU definition includes the following:

- RCRA-regulated units, such as container storage areas, tanks, surface impoundments, waste piles, land treatment units, landfills, incinerators, and underground injection wells
- Closed and abandoned units
- Recycling units, wastewater treatment units, and other units that EPA has generally exempted from standards applicable to hazardous waste management units
- Areas contaminated by routine and systematic releases of wastes or hazardous constituents. Such areas might include a wood preservative drippage area, a loading-unloading area, or an area where solvent used to wash large parts has continually dripped onto soils.

An AOC is defined as any area where a release to the environment of hazardous waste or constituents has occurred or is suspected to have occurred on a nonroutine and nonsystematic basis. This includes any area where such a release in the future is judged to be a strong possibility.

The purpose of the PA is as follows:

- Identify SWMUs and AOCs at the facility.
- Obtain information on the operational history of the facility.
- Obtain information on releases from any units at the facility.
- Identify data gaps and other informational needs to be filled during the VSI.

The PA generally includes review of all relevant documents and files located at state offices and at the EPA Region 5 office in Chicago.

The purpose of the VSI is as follows:

- Identify SWMUs and AOCs not discovered during the PA.
- Identify releases not discovered during the PA.
- Provide a specific description of the environmental setting.
- Provide information on release pathways and the potential for releases to each medium.
- Confirm information obtained during the PA regarding operations, SWMUs, AOCs, and releases.

The VSI includes interviewing appropriate facility staff, inspecting the entire facility to identify all SWMUs and AOCs, photographing all SWMUs, identifying evidence of releases, initially identifying potential sampling locations, and obtaining all information necessary to complete the PA/VSI report.

This report documents the results of a PA/VSI of the Accra Pac, Inc. (Accra Pac), facility in Elkhart, Indiana. The PA was completed on August 5, 1991. PRC gathered and reviewed information from Indiana Department of Environmental Management (IDEM) and from EPA Region 5 RCRA files. The VSI was conducted on August 7, 1991. It included interviews with Accra Pac facility representatives and a walk-through inspection of the facility. Five SWMUs and one AOC were identified at the facility. The VSI is summarized and ten inspection photographs are included in Attachment A. Field notes from the VSI are included in Attachment B.

2.0 FACILITY DESCRIPTION

This section describes the facility's location, past and present operations (including waste management practices), waste generating processes, release history, regulatory history, environmental setting, and receptors.

2.1 FACILITY LOCATION

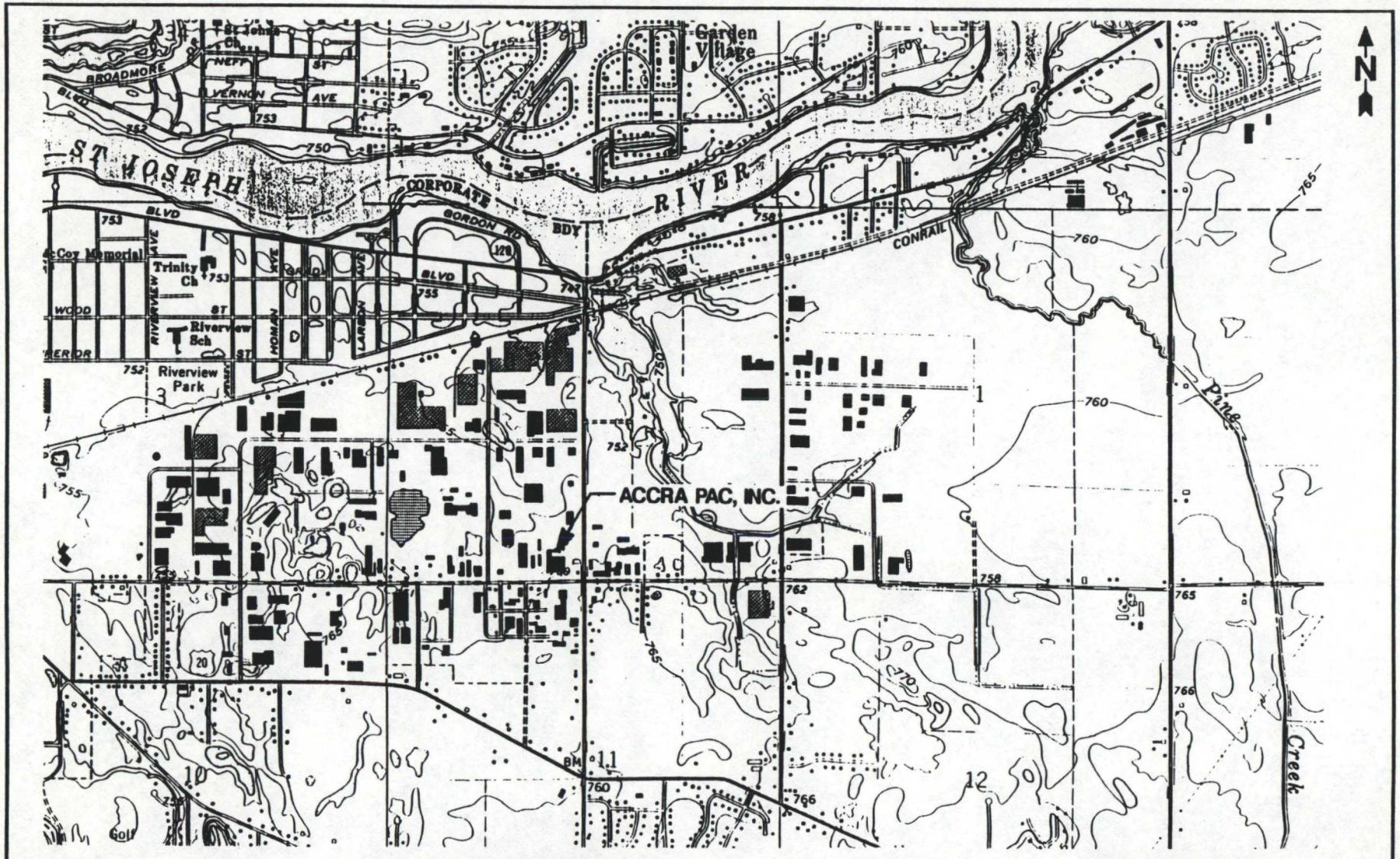
The Accra Pac facility is currently located at 2730 Middlebury Street, north of State Route 20, Elkhart, Elkhart County, in north central Indiana (latitude 41°40'46"N and longitude 85°55'04"W). Figure 1 shows the location of the Accra Pac facility. The facility occupies approximately 8.9 acres of an industrial park located just within the Elkhart City limits.

Accra Pac is bordered on the north by a print shop, on the west by Wolohan Hardware, on the south by Health Care Industries and Middlebury Street, and on the east by Fax Deli and Middleton Run Road. The Elkhart Municipal Airport is located about 4 miles northwest of the facility. The immediate area is sparsely populated and consists of commercial, agricultural, and residential areas. A 6-foot-high chain-link fence topped by three strands of barbed wire surrounds the Accra Pac facility and limits access.

2.2 FACILITY OPERATIONS

The main Accra Pac plant is a 50,000-square-foot warehouse used jointly for offices and manufacturing. This plant was constructed sometime before 1978. Additional on-site structures include a 78,000-square-foot storage warehouse, constructed in 1988, and 16,000-square feet of manufacturing and raw product storage buildings. Approximately 290 people are currently employed at the facility. Hazardous wastes that are generated at the facility accumulate in the drum storage area of the aerosol can shredder area (SWMU 2) and are manifested and removed in bulk within 90 days of accumulation. Wastewater is generated from process cleaning, noncontact cooling water, and reverse osmosis reject-water, and is discharged into the city sewer from the underground waste storage tanks (SWMU 1). Past and present SWMUs at Accra Pac are listed in Table 1. A layout of the facility, including SWMU locations is shown in Figure 2.

Before 1978, Accra Pac was located at 2600 Industrial Parkway, approximately 2000 feet northwest of its current location. In January 1976, a fire and chemical explosion destroyed the facility, forcing Accra Pac to relocate. Accra Pac representatives stated that the old site is currently being remediated. The EPA site number for the old site is IND 981 194 079.



ACCRA PAC, INC.
ELKHART, INDIANA

FIGURE 1

FACILITY LOCATION

ENVIRONMENTAL MANAGEMENT, INC.

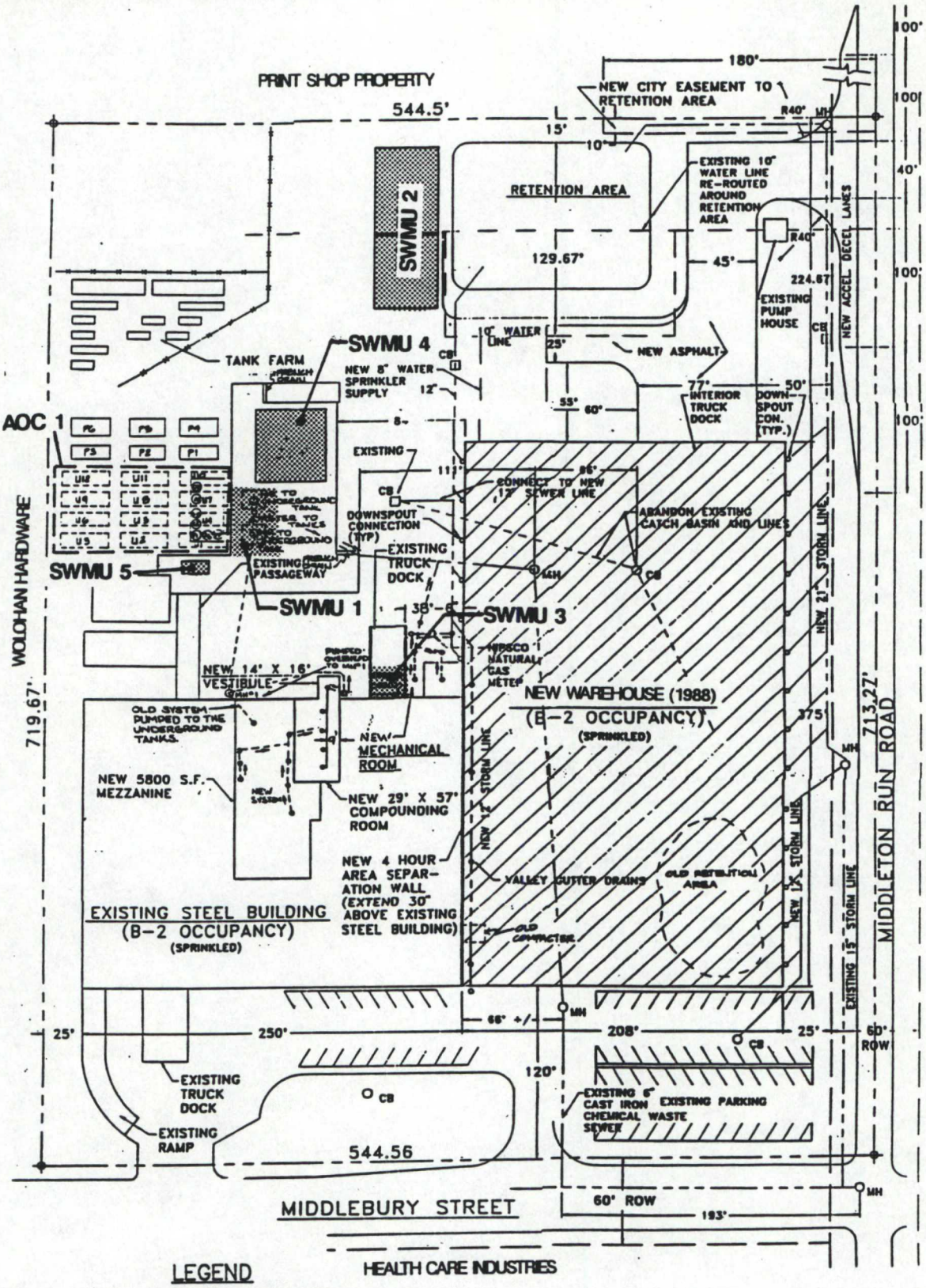
TABLE 1

SOLID WASTE MANAGEMENT UNITS (SWMU)

SWMU Number	SWMU Name	RCRA Hazardous Waste Management Unit*	Status
1	Underground Waste Storage Tanks	Yes	Active
2	Aerosol Can Shredder w/Drum Storage Area	No	Active; less than 90-day storage of hazardous wastes
3	Trash Compactor	No	Active
4	Former Drum Storage Area	Yes	Closed in 1985
5	Evaporator Pits	Yes	Inactive; removed

Note:

* A RCRA hazardous waste management unit is one that currently requires or formerly required a RCRA Part A or Part B permit.



LEGEND

SWMU 1 – UNDERGROUND WASTE STORAGE TANKS
SWMU 2 – AEROSOL CAN SHEDDER WITH DRUM STORAGE AREA
SWMU 3 – TRASH COMPACTOR
SWMU 4 – FORMER DRUM STORAGE AREA (CLOSED 1985)
SWMU 5 – EVAPORATOR PITS (INACTIVE)
AOC 1 – UNDERGROUND RAW CHEMICAL STORAGE TANKS

SOURCE: ACCRA PAC, INC., 8/7/91

NOT TO SCALE

ACCRA PAC, INC.
ELKHART, INDIANA

FIGURE 2
FACILITY LAYOUT

PRC ENVIRONMENTAL MANAGEMENT, INC.

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Accra Pac currently also leases from Options, Inc. a warehouse located at 210 Junior Achievement Avenue in Elkhart, Indiana. The warehouse is used for the storage of obsolete virgin chemicals. Two fires have occurred at the warehouse, one in 1985 and one in 1988, both caused by vandalism. The EPA site number for this warehouse is IND 984 897 983. The warehouse was not inspected during the VSI because Accra Pac does not own this facility.

Accra Pac performs contract manufacturing of aerosol and liquid automotive, household, and personal care products. These products are produced mainly from alcohol. The facility operates four process lines: three aerosol lines and one liquid line. The aerosol lines process products such as hair spray, mousse, and insecticides. Liquid line products include adhesives and automotive additives.

Premanufactured, labeled packaging containers are placed on a conveyor system that transports the containers through the production lines and charging lines. In the production lines, the containers are filled with the liquid and aerosol products and the aerosol cans are capped. Liquid products are generally capped by hand as they pass by on the conveyor belt. The aerosol cans are charged with the propellent, either isobutane or propane, after the caps of the cans are sealed or at the same time they are sealed. After sealing, the aerosol cans are submerged in a water tank to test for releases of propellent. Defective cans are disposed of in the aerosol can shredder (SWMU 2).

Accra Pac receives the commercial brand products either in concentrate, requiring dilution of the product before packaging, or in raw chemical form, requiring formulation of the product in batch processes before packaging. Leftover batches and residues of product are placed into drums for proper disposal. Currently, Accra Pac uses water and isopropyl alcohol for tank- and line-flushing. Isopropyl alcohol is used when the next step in the process requires anhydrous conditions. Process wastes from the four lines drain into two 10,000-gallon underground waste storage tanks (SWMU 1) that discharge into the Elkhart city sewer system under the Industrial Wastewater Discharge Permit, No. 85-20, which expires on March 13, 1995.

2.3 WASTE GENERATING PROCESSES

Accra Pac currently operates as a large-quantity generator of hazardous waste. Past and present hazardous and nonhazardous wastes generated at the facility are discussed below. Current waste streams are summarized in Table 2.

TABLE 2
SOLID WASTES

Waste/EPA Waste Code	Source	Primary Management Unit
Spent Solvent/F002	Line One Compounding and Charging	SWMU 2
Products Not Meeting Specifications/D001	Contract Manufacturing	SWMU 2
Pit Waste/D001	Aerosol Can Shredding	SWMU 2
Products Not Meeting Specifications/ Nonhazardous	Contract Manufacturing	SWMU 1
Solid Refuse	Plant Maintenance	SWMU 3

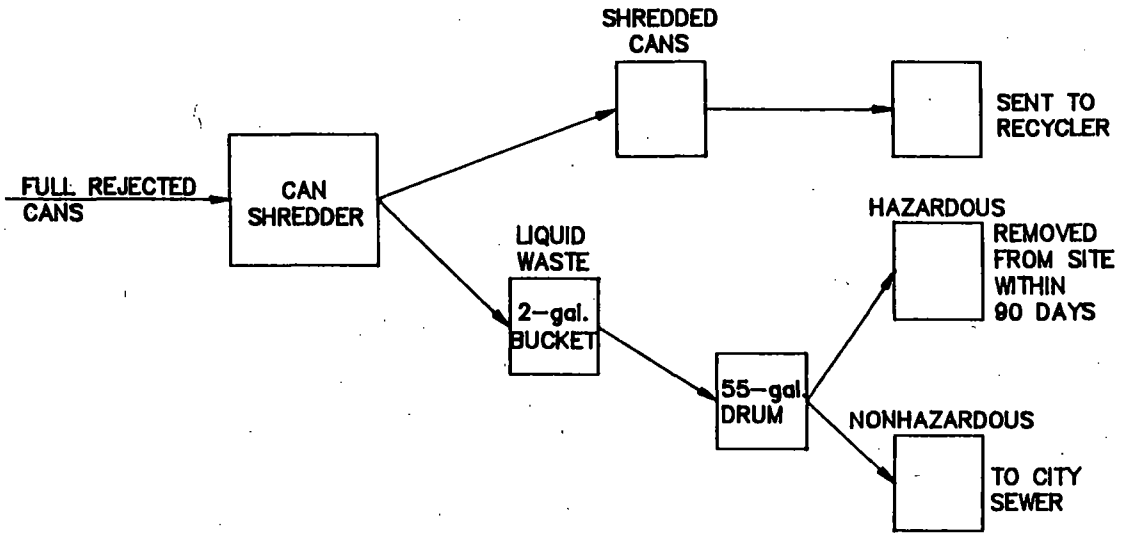
Hazardous Waste

Accra Pac currently generates two hazardous wastes: spent halogenated solvent (F002) and materials and products not meeting client's specifications. The halogenated solvent is used only in line one when the compounding and charging lines are used for materials high in total organic halogen (TOX). The spent halogenated solvent is primarily 1,1,1-trichloroethane and therefore cannot be discharged into the city sewer. In this case, the drainage pits from line one are locked-off from the underground waste storage tank system (SWMU 1). The drainage pits measure 24-inches square by 18-inches deep (see Photograph No. 9). During compounding and charging in line one, the drainage pits are pumped out into 55-gallon drums (see Figure 3). When full, these drums are moved to the drum storage area in the aerosol can shredder area (SWMU 2) for less than 90-day storage. The quantity of spent halogenated solvents generated varies depending on the process and on the basis that line one is not always used for hazardous solvents. Accra Pac representatives did not know the quantity of wastes generated during this process on line one.

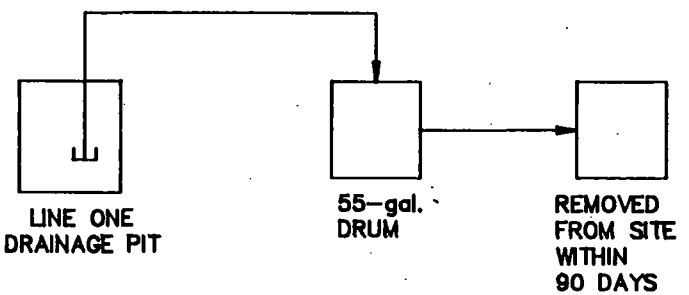
The facility must also dispose of its materials and products that do not meet client's specifications. Hazardous waste product is generated from the aerosol can shredder (SWMU 2). The aerosol cans are put into the shredder in bulk. The product from the aerosol cans drains into a 2-gallon bucket which is then poured into a 55-gallon drum by funnel (see Figure 3). The hazardous waste is stored in the adjoining drum storage area for less than 90 days. Spills from the shredding process go into a trench drain which is pumped into a 55-gallon drum and labeled as pit waste (D001). Figure 4 shows a schematic diagram of the aerosol can shredder with drum storage area (SWMU 2).

The liquid hazardous wastes from SWMU 2 are disposed of in bulk. The waste is pumped out of the drums so that less than 1 inch of residue remains. The facility's biennial generator report for 1989 indicates that over 37,000 pounds of waste liquid was sent to Ross Incineration Services in Grafton, Ohio. Jakacki Bag and Barrel, Inc. of Chicago picks up the spent 55-gallon drums for recycling and supplies additional drums as required.

Between 1980 and 1983, the facility operated two steam-heated evaporator pits (SWMU 5) that treated the spent hazardous wastewater from the production lines. Process water and floor drainage flowed into two 10,000-gallon underground waste storage tanks (SWMU 1) and then flowed to the evaporator pits. Each evaporation pit dissipated 40-gallons of water per



CAN SHREDDER FLOW DIAGRAM



WASTES ARE PUMPED FROM DRAINAGE PIT OVERHEAD TO 55-gal. DRUM DURING COMPOUNDING AND CHARGING IN LINE ONE. WHEN DRUM IS FULL, IT IS REMOVED FROM ACCRA PAC SITE WITHIN 90 DAYS.

LINE ONE HAZARDOUS WASTE FLOW DIAGRAM

ACCRA PAC, INC.
ELKHART, INDIANA

FIGURE 3

WASTE FLOW DIAGRAMS

PRC ENVIRONMENTAL MANAGEMENT, INC.

SOURCE: ACCRA PAC, INC., 8/7/91

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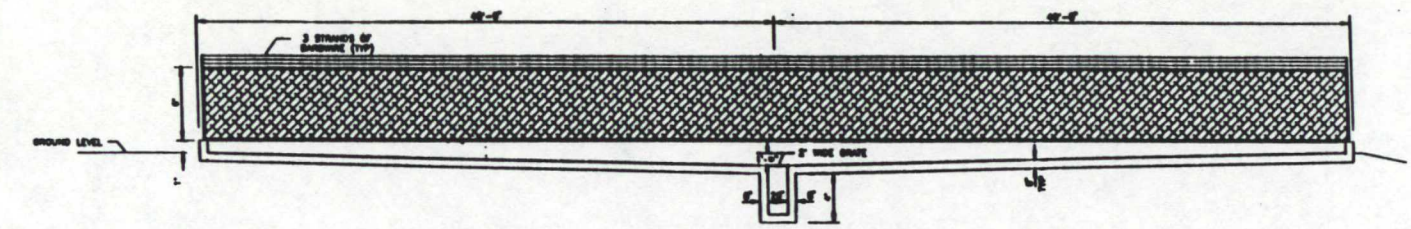
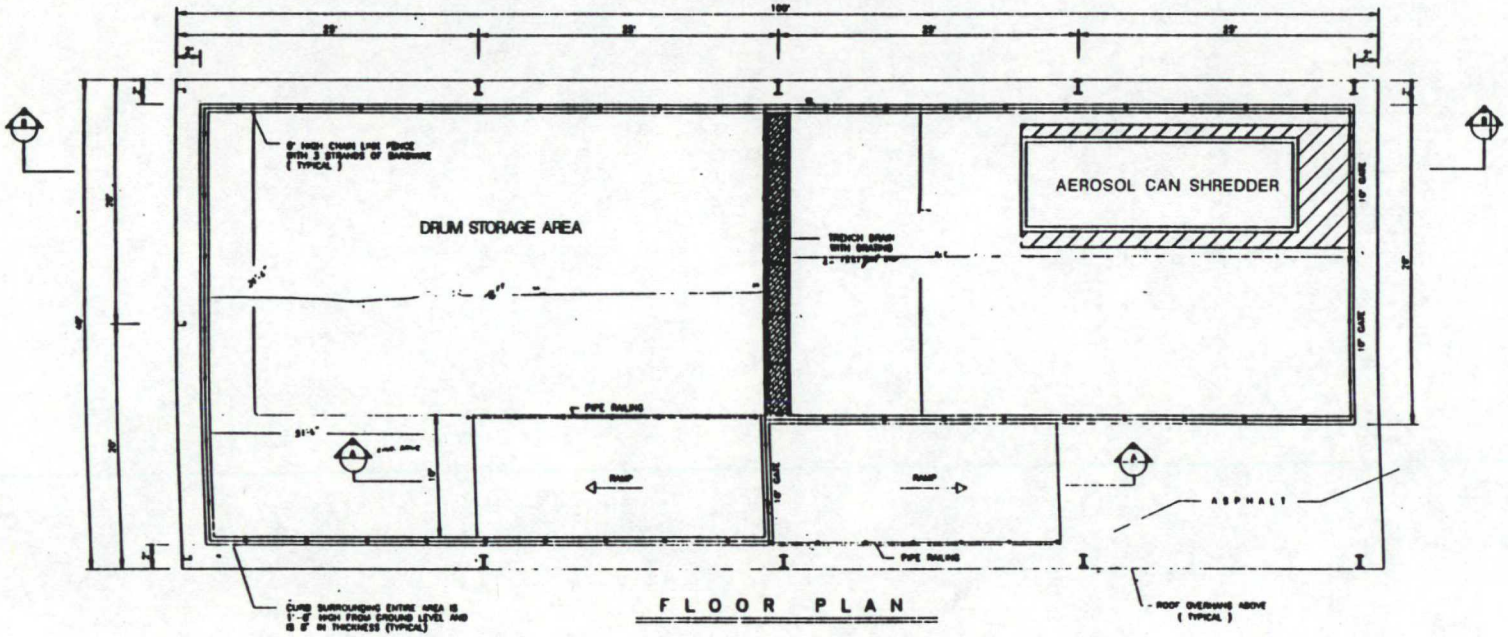
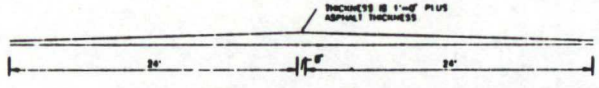


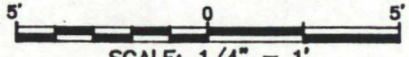
SECTION B - B



FLOOR PLAN



SECTION A - A



SCALE: 1/4" = 1'

SOURCE: ACCRA PAC, INC., 8/7/91

ACCRA PAC, INC.
ELKHART, INDIANA

FIGURE 4

SCHEMATIC DIAGRAM OF SWMU 2

PRC ENVIRONMENTAL MANAGEMENT, INC.

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hour. Sludge from the bottom of the underground waste storage tanks and the bottom of the evaporator pits was removed about once a year and placed into drums. The drums were moved to the drum storage area (SWMU 4) for storage until disposal. The hazardous materials that Accra Pac handled at this time were ignitable solvents and chlorinated solvents (D001 and F002). Both SWMU 4 and 5 are currently inactive.

Before 1980, the underground waste storage tanks (SWMU 1) that received the process water and floor drainage were used as a holding tank for the spent hazardous solvents. Approximately 500 gallons of spent solvent were discharged to the holding tanks each week. Known constituents of the discharge were methylene chloride, toluene and chlorinated solvents, and insecticides. The waste was estimated to consist of 50 percent solvents (2 to 5 percent chlorinated) and 50 percent water. The waste was disposed of in bulk by A-1 Disposal, in Plainwell, Michigan (ISBH, 1978a).

Nonhazardous Waste

Accra Pac currently generates two nonhazardous waste streams: materials and products not meeting specifications (which include tank flushes) and solid refuse. The nonhazardous waste that is captured from the aerosol can shredder is put into drums and placed in the adjoining drum storage area (SWMU 2). The contents of these drums are disposed of by discharge into the city sewer under Industrial Wastewater Discharge Permit No. 85-20. Tank flushes that contain nonhazardous solvents such as water and isopropyl alcohol are also discharged into the city sewer.

The second nonhazardous waste stream is miscellaneous solid refuse generated during normal plant operations. The waste, which includes spent packaging material, empty containers, discontinued personal care products, skin protection, and food and other ingestible products, is placed in a trash compactor (SWMU 3) before being shipped to an Indiana state permitted sanitary landfill in a 45-cubic-yard bin, solid waste disposal Case No. 1148.

2.4 RELEASE HISTORY

Documents from Accra Pac described a number of releases during the past 14 years. Releases of both waste and product material have occurred. In November 1978, representatives of the Elkhart County Health Department (ECHD) conducted an inspection of the Accra Pac facility. The inspection revealed that the facility disposed of various types of liquid waste, including solvents, into an unlined pit located in the northeast section of the facility's property (ISBH, 1978b). Facility representatives did not know anything about the unlined pit. PRC believes that the unlined pit mentioned above is the old retention area located in the southeast

section of the facility (see Figure 2). In November 1987, 15 cubic yards of soil was removed from the old retention area and transported off site to Chem Met Services by A&B Industrial. Construction of the new warehouse over the old retention area was completed in 1988. PRC does not consider the old retention area to be an AOC; the construction of the new warehouse over the old retention area will eliminate the infiltration of rainwater through the existing soil.

During the November 1978 inspection, ECHD observed a considerable amount of liquid waste spillage near the trash compactor (SWMU 3) on the asphalt surface. This spillage resulted from liquid leaking from the compactor due to crushing aerosol containers. Spillage was also observed adjacent to the former drum storage area (SWMU 4) on the ground surface. This spillage resulted from the flushing of the drum storage area with water when a spill occurred (ISBH, 1978b). Accra Pac responded to the violations by placing a curb around the trash compactor area in 1979 to contain the spillage and enable appropriate cleanup, and did not flush the drum storage area thereafter (ISBH, 1979).

During closure of the drum storage area (SWMU 4) in 1983, soil-boring samples were collected and analyzed. Soil samples were collected at a depth of 6 inches in the unpaved areas adjacent to the drum storage area. Soil test results indicated that the top 6 inches of soil around the drum storage area were contaminated with 1,1,1-trichloroethane at a maximum concentration of 890 parts per billion (ppb) and tetrachloroethylene at a maximum concentration of 420 ppb. The topsoil adjacent to the drum storage area was not excavated because according to Accra Pac studies have shown that 50 percent of a 1,000 ppb solution of 1,1,1-trichloroethane evaporated within 30 minutes. Also, 75 percent solutions of tetrachloroethylene were shown to volatilize from surface impoundments in 12.4 days. Accra Pac believed that the 1,1,1-trichloroethane and tetrachloroethylene concentrations found in the soil around the drum storage area were subject to eventual dissipation by air currents in the top 6 inches of soil (Accra Pac, 1983b and EIS, 1983).

In 1978, ECHD also observed a significant amount of oil in the cooling water pond or retention pond (actually shown as old retention area in Figure 2). The pond was also leased to the city for retention of rainwater runoff from Middlebury Street and Middleton Run Road. Accra Pac indicated that 4 to 5 gallons of oil were inadvertently disposed of through a floor drain in the compressor room (ISBH, 1978b). Accra Pac reported that no more oil or foreign matter was going into the pond from the compressor room, and that they were planning to prevent storm water runoff from washing across the storage pad and entering the pond (Accra Pac, 1978). Before construction of the new warehouse in 1988, Accra Pac removed 15 cubic yards of nonhazardous soil from the bottom of the pond for disposal by Chem Met Services in Michigan (A&B, 1987).

In May 1987, approximately 20 gallons of soybean oil were released from a damaged 55-gallon drum in the chemical drum storage warehouse. The storage warehouse was equipped with trench drains that led to the underground waste storage tanks (SWMU 1) for discharge to the Elkhart Treatment Works. The spill was later discovered in the warehouse because the trench drain was plugged up, causing the soybean oil to flow out from under the steel wall onto the ground. Contaminated soil in the area of release was removed with a front-end loader to a depth of 6 inches, 2 inches below the level of the noticeable oil. The soil was placed in 55-gallon drums for proper disposal. Subsequently, the trench drain to the underground waste storage tanks was cleaned out (Accra Pac, 1987).

2.5 REGULATORY HISTORY

Accra Pac's regulatory history from 1978 consists of several RCRA compliance inspections, the development and implementation of the storage facility closure plan, and the facility's subsequent request for change in status as a treatment, storage, or disposal (TSD) facility to a large quantity generator of hazardous waste.

In December 1980, EPA conducted a compliance sampling inspection for toxics (CSI-T) and an interim status standards (ISS) inspection. Organic analysis indicated very high levels of contaminants in sediment samples, but low levels of organics in the septic system and cooling water pond samples (EPA, 1981). The inspection revealed that Accra Pac did not submit a Part A permit application. On April 27, 1981, at the request of the EPA, Accra Pac submitted a Part A permit application as a RCRA TSD facility. The application listed a capacity of 20,000 gallons of tank storage (S02), and a 200-gallons-per-day capacity for thermal treatment or evaporation (T04) of waste flammable liquid D001 (Accra Pac, 1981).

In September 1983, Accra Pac notified EPA of its intention to close the TSD facility (Accra Pac, 1983a). On March 7, 1985, the facility was inspected for RCRA compliance and to evaluate the facility's closure activities. At that time, the drum storage area contained several empty drums and approximately seventeen drums of contaminated soil and gravel. The soil and gravel were generated by a spill from an unidentified underground storage tank on January 21, 1985. The next day the drums containing the spilled material were moved inside the warehouse. The closure activities were considered to be adequate by the Indiana Environmental Management Board. Closure of Accra Pac's container storage (S01) was approved in April 1985 (IEMB, 1985).

In May 1984, EPA cited Accra Pac for noncompliance with ISS because EPA charged that Accra Pac operated underground storage tanks and a container storage facility without a permit. A penalty of $63,400 was assessed (EPA, 1984).

RCRA compliance inspections were conducted by the Indiana Department of Environmental Management (IDEM) in September 1986, March 1988, and May 1991. The inspection in 1986 noted minor violations related to personnel training programs, arrangements with local authorities, and lack of spill control equipment near the less than 90-day drum accumulation area. This visit was also a post-closure inspection to verify closure of the over 90-day container storage area. Accra Pac had not stored hazardous waste for more than 90 days since going through closure (IDEM, 1986).

IDEM cited Accra Pac with the following violations in 1988: (1) Accra Pac failed to determine if aerosol can wastes were hazardous prior to disposing them at the Elkhart County landfill. (The contents of the aerosol cans were later determined to be a hazardous waste D001); (2) Accra Pac transported the hazardous waste (D001) off-site for disposal without a manifest; and (3) Accra Pac disposed of hazardous waste (D001) at the Elkhart County landfill, which does not have an EPA identification number or a permit (IDEM, 1990).

The inspection by IDEM in May 1991 was prompted by an anonymous letter from an Accra Pac employee accusing Accra Pac of purposely violating RCRA regulations. Some of these alleged violations include the following: (1) hazardous process waste was disposed of in the city sewer when the city was not monitoring the check point, (2) hazardous waste was stored in excess of the regulated period, (3) hazardous wastes were not labeled, (4) drums of hazardous waste were moved to a downtown Elkhart warehouse, (5) obsolete chemicals were sold to local residents without record to cut Accra Pac's handling costs, and (6) Accra Pac's underground storage tanks were thought to be leaking (Anonymous, 1991). IDEM will probably cite Accra Pac with the following violations:

- Storage of hazardous waste without a permit
- Improper management of hazardous waste to minimize release
- Lack of waste determination
- Storage of open containers
- Drums not marked with accumulation start date
- Drums in poor condition
- Ignitable hazardous waste stored less than 50 feet from property line
- Personnel training deficiency
- 1989 biennial report not submitted to IDEM

- Copies of manifests not submitted to IDEM
- No waste analysis on file
- No operating procedures on file

IDEM stated that more violations may be cited against Accra Pac by the time the investigation is completed (Ireland, 1991).

Accra Pac has an Industrial Wastewater Discharge Permit (No. 85-20) to discharge process wastewater into the Elkhart Treatment Works. The permit expires on March 13, 1995. Self-monitoring tests of the wastewater are to be conducted and reported once each month. Average effluent flows were not calculated because discharge from the batch manufacturing process is sporadic.

Accra Pac is permitted by IDEM to dispose of discontinued and off-specification personal care products, skin protection products, food and other ingestible products, household products, and empty containers at any Indiana state permitted sanitary landfill. This general Solid Waste Disposal Permit (Case No. 1148) expires December 31, 1991 (IDEM, 1990c). Accra Pac was also permitted for special disposal of 16 cubic yards of sediment contaminated with lead (Case No. 84), and 5 cubic yards of corn cobs and rust (Case No. 01111) (IDEM, 1990a and IDEM, 1990d).

2.6 ENVIRONMENTAL SETTING

This section describes the climate, flood plain and surface water, geology and soils, and ground water in the vicinity of the Accra Pac facility.

2.6.1 Climate

The climate in Elkhart County is temperate. The average temperature is 49.6°F. The average daily minimum temperature is 15.5°F in January, and the average daily maximum temperature is 83.1°F in July. The average annual precipitation is 33.7 inches. The mean annual evaporation for the area is about 30 inches, annual net precipitation of 3.7 inches (U.S. Department of Commerce, 1968). The 1-year 24-hour rainfall is 2.3 inches (U.S. Department of Commerce, 1963). The prevailing wind is from the southwest. Maximum average wind speed is 12 miles per hour (U.S. Department of Commerce, 1968).

2.6.2 Flood Plain and Surface Water

The nearest surface water to Accra Pac is the St. Joseph River. The river is about 0.7 mile north of the facility. The facility grounds are not sloped, and the facility is not located in a 100-year flood plain. A retention pond that receives precipitation runoff from the facility grounds is located on the far north side of the facility adjacent to the aerosol can shredder unit (SWMU 2) (see Photograph No. 10).

2.6.3 Geology and Soils

Topography in the vicinity of the facility includes areas dominated by 0 to 2 percent slopes. The soils are Fox Sandy Loam and consist of moderately coarse-textured soils that are fairly deep over loose sand and gravel. These soils formed under mixed hardwoods in loamy outwash material (U.S. Department of Agriculture, 1972). According to well logs, a mixture of dry sand and gravel covers the area to a depth of 44 feet (IDNR, 1991). The depth to the bedrock is unknown.

2.6.4 Ground Water

Wells are the major source of drinking water in Elkhart County. The City of Elkhart draws ground water from four separate well fields. The nearest well field to the facility is about 3 miles to the southwest. The direction of ground water flow in the area of the facility is northwest. Many residents living outside the Elkhart city limits get their water from private wells (EPA, 1985). The static ground water level is 10 to 15 feet below ground surface (IDNR, 1991).

2.7 RECEPTORS

The Accra Pac facility occupies about 8.9 acres of an industrial park east of the City of Elkhart, Indiana. Elkhart has a population of 47,325 and is located in Elkhart County. Riverview Grade School is located about 1.2 miles northeast of the facility. Residential areas lie within 200 feet of the facility.

Accra Pac facility is bordered on the north by a print shop, on the west by Woohan Hardware, on the south by Health Care Industries and Middlebury Street, and on the east by Fax Deli and Middleton Run Road. The Elkhart Municipal Airport is located about 4 miles northwest of the facility. A 6-foot-high chainlink fence topped by three strands of barbed wire surrounds the Accra Pac facility and limits access. The immediate area is sparsely populated and consists of

commercial, agricultural, and residential areas. Accra Pac operates two manufacturing work shifts Monday through Friday.

Drinking water for the City of Elkhart is supplied by ground water wells located approximately 3 miles southwest of the facility. The well fields are not located directly downgradient of the Accra Pac facility. Many residents of Elkhart obtain water from private ground water wells.

Sensitive environments in the area include the wetlands of the St. Joseph River and the river itself both about 0.7 mile north of the facility. The river and wetland areas support a variety of wildlife including ducks and geese. The river is used for recreational fishing.

3.0 SOLID WASTE MANAGEMENT UNITS

This section describes the five SWMUs identified during the PA/VSI. The following information is presented for each SWMU: description of the unit, dates of operation, wastes managed, release controls, history of release, and PRC observations.

SWMU 1 **Underground Waste Storage Tanks**

Unit Description: This unit consists of two 10,000-gallon steel underground storage tanks located south of the raw material drum storage building. This unit was originally used to retain the fluctuating chlorinated solvent waste flows from the facility prior to discharge into evaporation pits (SWMU 4). The unit currently acts as safeguard to prevent hazardous waste spills from reaching the city's sewer system. The drainage pits from line one, waste drainage from production, and sump waste drain into the south tank, which is aerated to keep particles from settling out. The waste is pumped from the south tank to the north tank when the south tank is approximately three-fourths full. The second tank discharges to the Elkhart Treatment Works (ETW) under Industrial Wastewater Discharge Permit No. 85-20. The wastewater discharge is measured by a flow meter that is locked and maintained by the ETW. If a spill reaches a drain, it can be contained within the first storage tank by manually shutting off the pump (see Photograph No. 1).

Date of Startup: This unit began operation sometime before 1978.

Date of Closure: This unit is currently operating.

Wastes Managed: Wastewater is currently generated from cleaning and filling equipment, noncontact cooling water, and reverse osmosis reject-water. The sanitary wastewater does not flow through the storage tanks. Before 1983, this unit stored methylene chloride, toluene and chlorinated solvent wastes, and insecticides prior to disposal in bulk by A-1 Disposal in Michigan.

Release Controls: The tanks are constructed of single-walled steel with no form of release control.

History of Release: No releases from this unit have been documented.

Observations: PRC noted that the concrete slab over the tanks was in good condition.

SWMU 2 **Aerosol Can Shredder with Drum Storage Area**

Unit Description: This unit is an approximately 40- by 100-foot diked concrete area that slopes inward towards a trench drain. The area is roofed and surrounded by a 6-foot chainlink fence topped by three strands of barbed wire. The shredder is located along the east fence of the unit (see Figure 4). The defective product cans are drained and smashed, releasing the aerosol propellent (propane or isobutane) to the atmosphere. The chemical contents are captured, segregated, and classified for appropriate waste disposal. The drum storage area is just north of the shredder unit. The nonhazardous waste drums are stored along the north fence approximately 25 feet from Accra Pac's property line. The hazardous waste is kept at least 50 feet from the property line behind a yellow stripe on the concrete pad. The drum storage area and the shredder unit are also separated by a 6-foot chainlink fence. The nonhazardous drums are emptied into the underground waste storage tanks (SWMU 1) while the hazardous drums are shipped off-site for disposal within 90 days of initial collection (see Photographs No. 2 through 6).

Date of Startup: This unit began operation in August 1988.

Date of Closure: This unit is currently operating.

Wastes Managed: This unit empties product containers that do not meet specifications (D001).

Release Controls: This unit is located on a sloped concrete floor with a trench drain that collects residues from the shredding process. The trench drain

contents are pumped into drums labeled "Pit Waste" and are treated as hazardous waste.

History of Release: No liquid waste releases from this unit have been documented. The aerosol propellant, either propane or isobutane, is released to the atmosphere during operation of the aerosol can shredder unit.

Observations: PRC noted 38 drums of hazardous waste and fifteen drums of nonhazardous waste being stored in the unit; they were in good condition and labelled with the accumulation start date and contents. PRC noted that the concrete below the shredder was wet.

SWMU 3 **Trash Compactor**

Unit Description: This steel unit horizontally compacts solid waste, which is then deposited into a 45-cubic-yard bin for waste disposal. It is located on the facility's loading dock on the north side of the building. A chainlink fence completely encloses the compaction unit. (see Photograph No. 7).

Date of Startup: This unit originally began operation sometime before 1978. In 1988, it was removed from the east side of the building during the construction of the new warehouse and installed at its present location.

Date of Closure: This unit is currently active.

Wastes Managed: This unit is used to compact the facility's nonhazardous solid waste prior to off-site shipment to a local landfill.

Release Controls: This unit is currently located on a sloped concrete loading dock with diked walls. The area has a gravel-lined drainage gutter that empties into the 10,000 gallon underground storage tanks prior to discharge to the city sewer system.

History of Release: This unit was used to crush aerosol cans containing product in 1978, resulting in a considerable amount of waste spillage onto the asphalt surface near the trash compactor on the east side of the

	building. In 1979 curbing was installed to prevent runoff onto the ground surface.
Observations:	PRC noted that wastes were contained within the bin and there was no evidence of release.
SWMU 4	**Former Drum Storage Area**
Unit Description:	This unit was an approximately 50-foot by 60-foot paved area surrounded by a fence. It was located just north of the underground waste storage tanks.
Date of Startup:	This unit began operation sometime before 1978.
Date of Closure:	This unit became inactive in 1985 and was closed.
Wastes Managed:	This unit was used to store drums of solvent wastes (D001) and process wastewater when the underground waste storage tanks (SWMU 1) were full. It also held sludge from the evaporator pits and the underground waste storage tanks.
Release Controls:	This unit was on an asphalt pad, but had no other form of release controls.
History of Release:	Spillage of liquids in the drum storage area was removed by flushing down the area with water and allowing the liquid to flow onto the adjacent ground surface. During closure of this unit, soil samples revealed that chlorinated solvents at a concentration of less than 1000 ppb were present in the underlying and surrounding ground.
Observations:	PRC noted that this unit had been removed and the area it once occupied now houses raw chemical drums. No evidence of spills or stains were observed.

SWMU 5	**Evaporator Pits**
Unit Description:	This unit consisted of two steam-heated evaporation units capable of dissipating 40 gallons of water per hour. Each unit, located southwest of the underground waste storage tanks (SWMU 1), measured 9- by 6-feet and was 3-inches deep.
Date of Startup:	This unit began operation in 1980.
Date of Closure:	This unit was removed in 1983.
Wastes Managed:	This unit received wastewater from the underground waste storage tanks (SWMU 1). The waste was composed of approximately 50 percent solvents (2-5 percent chlorinated) and 50 percent water.
Release Controls:	This unit had no form of release control.
History of Release:	No releases from this unit have been documented.
Observations:	PRC did not observe the area that contained the evaporator pits. After the unit was removed, a hallway was constructed over the area that contained the evaporator pits.

4.0 AREAS OF CONCERN

PRC identified one AOC during the PA/VSI. This is discussed below.

AOC 1 - Underground Raw Chemical Storage Tanks

Accra Pac is planning to remove these units when the new, aboveground raw chemical tanks are complete. This new tank farm will be located west of the aerosol can shredder, near the propellent tank farm. The old underground tanks were in place when the facility was purchased in 1978. This tank farm is made up of twelve single-walled steel tanks. Representatives of the facility stated that the tanks are integrity-tested annually and the results are sent to the Elkhart County Health Department. Contents of the tanks include: methanol, SDA 40-A alcohol, diesel fuel, automotive additives, and water. PRC considers this an area of concern because of the age of the single-walled steel tanks. Release of wastes is also possible during the removal of the tanks (see Photograph No. 8).

5.0 CONCLUSIONS AND RECOMMENDATIONS

The PA/VSI identified five SWMUs and one AOC at the Accra Pac facility. Background information on the facility's location, operations, waste generating processes, release history, regulatory history, environmental setting, and receptors is presented in Section 2.0. SWMU-specific information, such as the unit's description, dates of operation, wastes managed, release controls, release history, and observed condition, is discussed in Section 3.0. The AOC is discussed in Section 4.0. PRC's conclusions and recommendations for each SWMU and AOC follow. Table 3 identifies the SWMUs and the AOC at the Accra Pac facility and suggested further actions.

SWMU 1 **Underground Water Storage Tanks**

Conclusions: This unit is currently used for discharge of nonhazardous waste into the Elkhart Treatment Works. The tanks are single-walled steel tanks with no form of release control. In the past, this unit was used to store chlorinated solvent wastes prior to thermal treatment in SWMU 5 or disposal in bulk by A-1 Disposal in Michigan. No releases from this unit have been documented. The potential for release to environmental media is low.

Recommendations: Annual integrity and leak testing should be conducted. If leak test fails, soil samples should be collected from around the tank.

SWMU 2 **Aerosol Can Shredder with Drum Storage Area**

Conclusions: This unit empties products not meeting specifications and crushes aerosol cans for recycling. Product wastes are separated into hazardous or nonhazardous waste and put into 55-gallon drums for proper disposal. The unit is maintained within a sound diked concrete area that slopes inward towards a sump. No liquid waste release from this unit has been documented. Therefore, the potential for release to soil, ground water, and surface water is low. The aerosol propellent is released to the atmosphere during operation of the aerosol can shredder unit. The potential for release to air is moderate.

Recommendations: Air monitoring of the propellent releases should be conducted.

TABLE 3

SWMU AND AOC SUMMARY

	SWMU	Operational Dates	Evidence of Release	Suggested Further Action
1.	Underground Waste Storage Tanks	Began Operating Before 1978 and Still Active	None	Annual integrity and leak testing
2.	Aerosol Can Shredder with Drum Storage Area	1988 to Present	Air Releases	Air monitoring
3.	Trash Compactor	Began Operating Before 1978 and Still Active	Past Release in 1978 to soil	No further action
4.	Former Drum Storage Area	1978 to 1985	Contaminated Soil, 1,1,1-trichloroethane	Unit closed in 1985, no further action
5.	Evaporator Pits	1980 to 1983	None	Unit removed in 1983, no further action

	AOC	Operational Dates	Evidence of Release	Suggested Further Action
1.	Underground Raw Chemical Storage Tanks	Began Operating Before 1978 and Still Active	None	Monitor removal actions and collect samples soil if contamination is suspected

SWMU 3 **Trash Compactor**

Conclusions: This unit is located on a concrete loading dock with drains to SWMU 1 and is not used to dispose hazardous waste. The potential for release to environmental media is minimal.

Recommendations: No sampling or monitoring needs to be conducted at this time.

SWMU 4 **Former Drum Storage Area**

Conclusions: This unit was closed in April 1985. Soil sampling, conducted as part of closure activities, indicated that the ground surface adjacent to the pad was contaminated with chlorinated solvents at a concentration of less than 1000 ppb. The potential for release to environmental media is low.

Recommendations: No sampling or monitoring needs to be conducted at this time.

SWMU 5 **Evaporator Pits**

Conclusions: This unit was removed in 1983. No releases from this unit have been documented. The potential for release to environmental media is low.

Recommendations: No sampling or monitoring needs to be conducted at this time.

AOC 1 **Underground Raw Chemical Storage Tanks**

Conclusions: Accra Pac plans to remove these units within the next 12 to 18 months. The potential for release to environmental media is moderate.

Recommendations: Monitor removal actions and collect soil samples if contamination is suspected.

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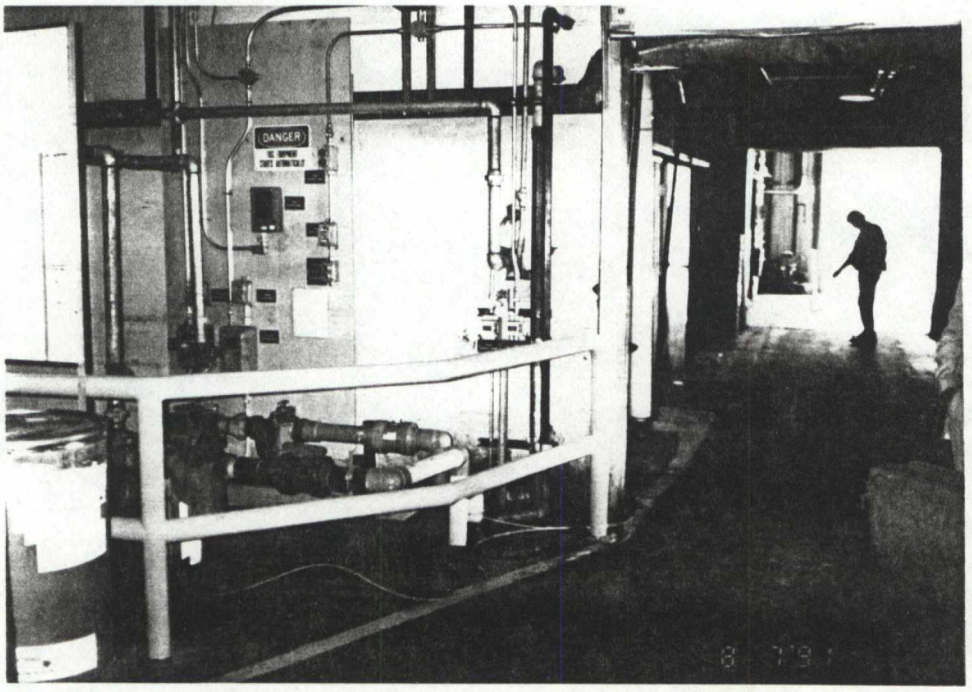
ATTACHMENT A

VISUAL SITE INSPECTION SUMMARY AND PHOTOGRAPHS

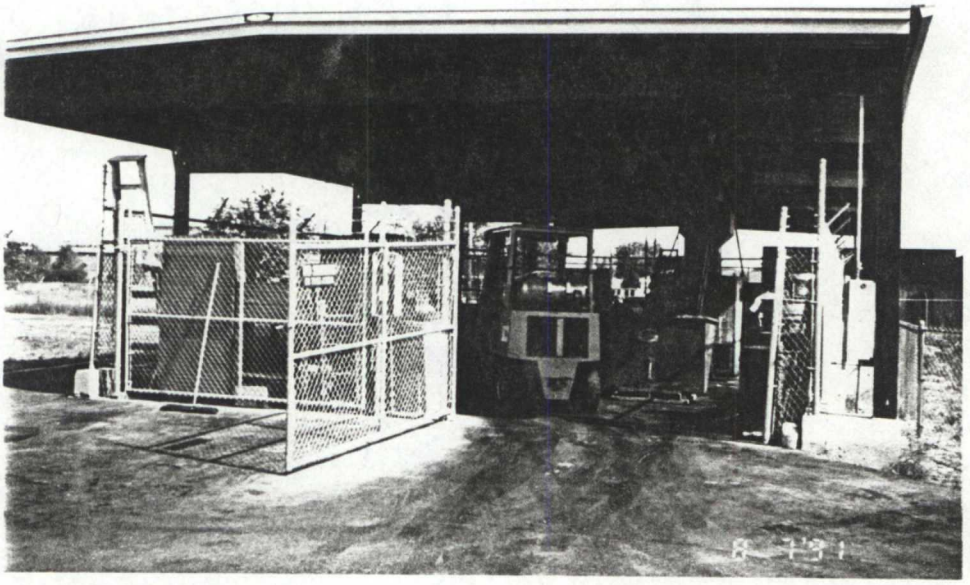
VISUAL SITE INSPECTION SUMMARY

Accra Pac, Inc. (Accra Pac)
Elkhart, Indiana
IND 042 080 614

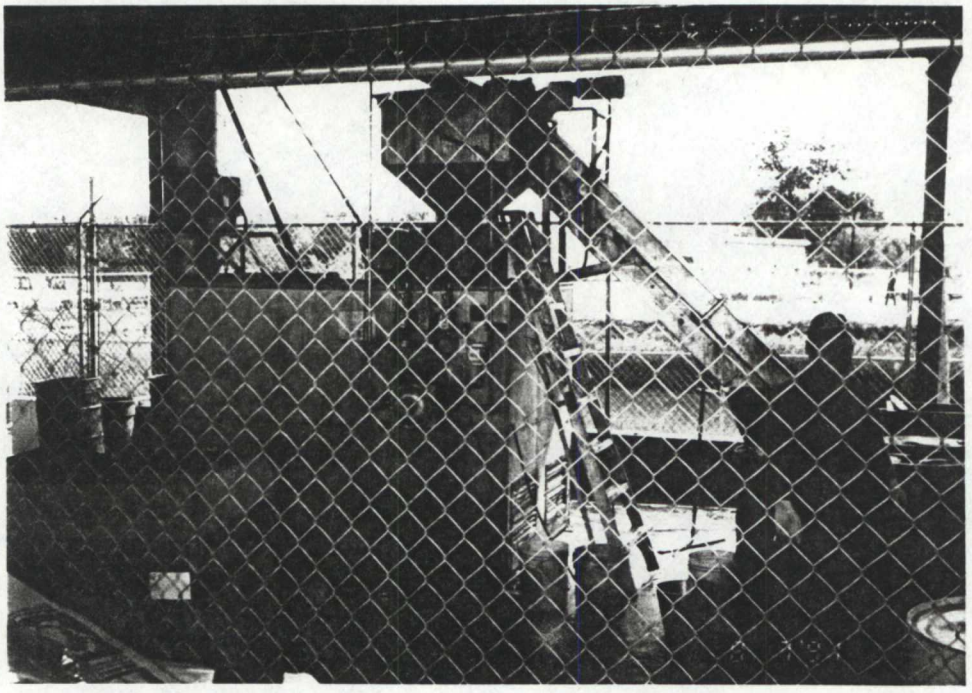
Date:	August 7, 1991
Facility Representatives:	Judy Hennessey, Accra Pac Robert Theroux, Accra Pac Debra Shah, Accra Pac Ken Kesler, Accra Pac Larry McHugh, Counsel for Accra Pac
Inspection Team:	Michael Keefe, PRC Environmental Management, Inc. (PRC) Keith Foszcz, PRC
Photographer:	Michael Keefe, PRC
Weather Conditions:	Sunny, 80°F
Summary of Activities:	The visual site inspection (VSI) began at 8:00 a.m. Central Time with an introductory meeting with facility representatives. The inspection team began the meeting with a discussion of the purpose of the VSI and the agenda for the inspection. Facility representatives continued the meeting with a discussion of Accra Pac's operations. At 9:45 a.m., facility representatives gave the inspection team a tour of the facility, including production and solid waste management areas, and explained waste generating processes. The inspection team took ten photographs of areas related to past and present solid waste management. The tour concluded at 10:55 a.m. The inspection team then held an exit meeting with facility representatives. The VSI was completed at 11:30 a.m.



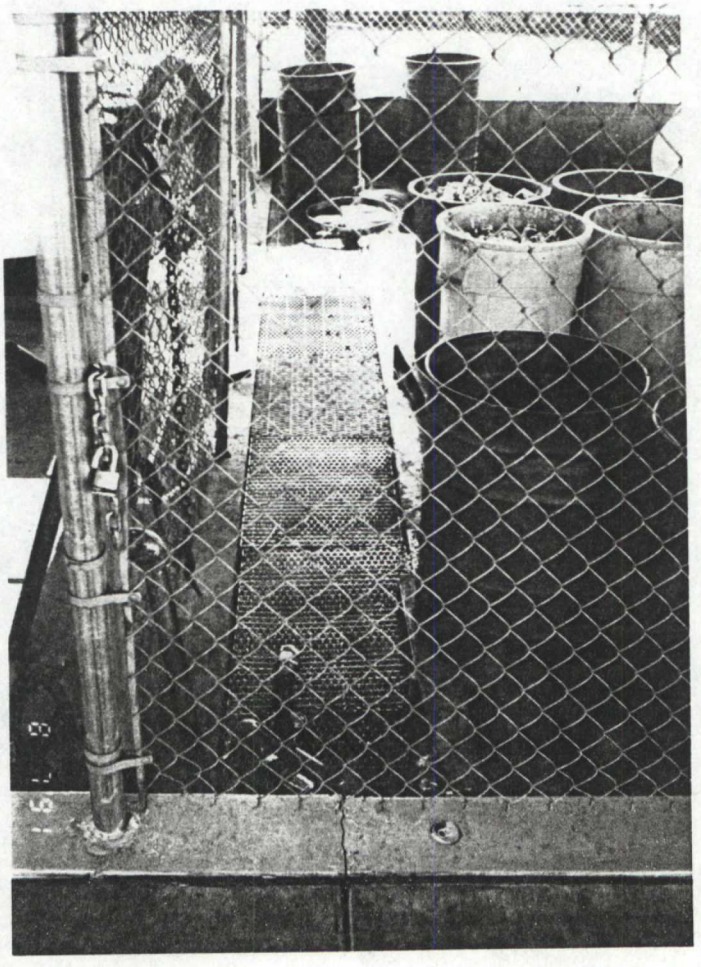
Photograph No. 1 Location: SWMU 1
Orientation: South Date: 08/07/91
Description: Ventilation and flow monitoring devices for the underground waste storage tanks.



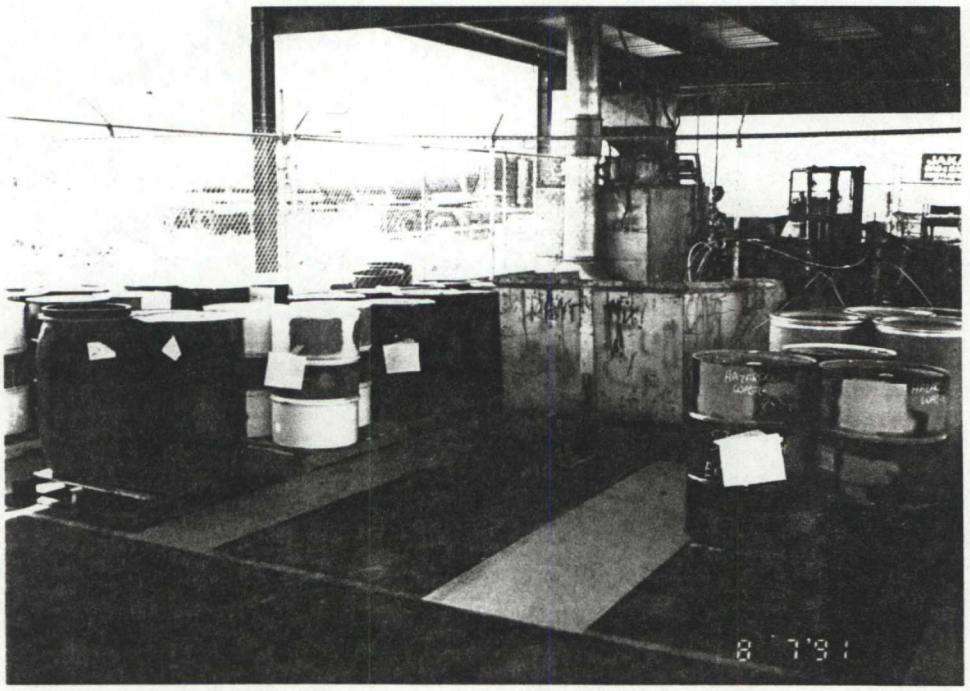
Photograph No. 2 Location: SWMU 2
Orientation: North Date: 08/07/91
Description: Entrance to the aerosol can shredder unit.



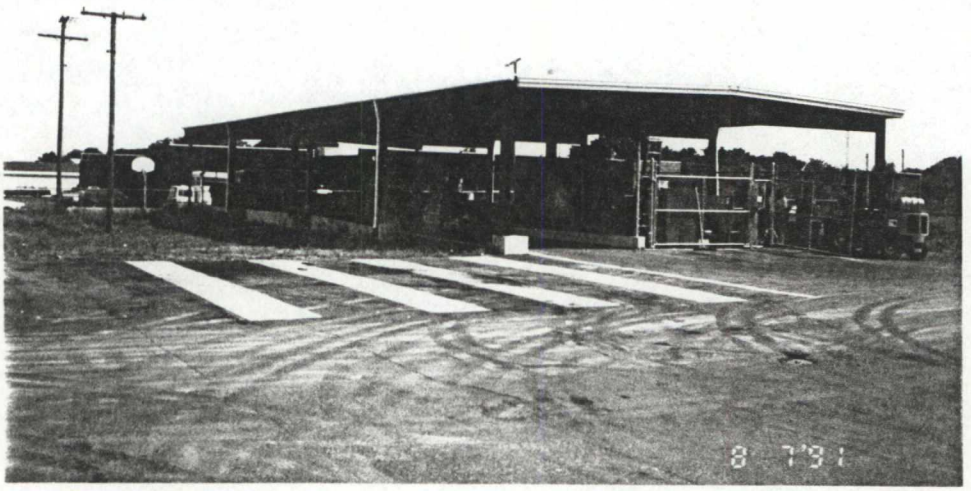
Photograph No. 3 Location: SWMU 2
Orientation: East Date: 08/07/91
Description: Aerosol can shredder unit showing wet concrete slab below.



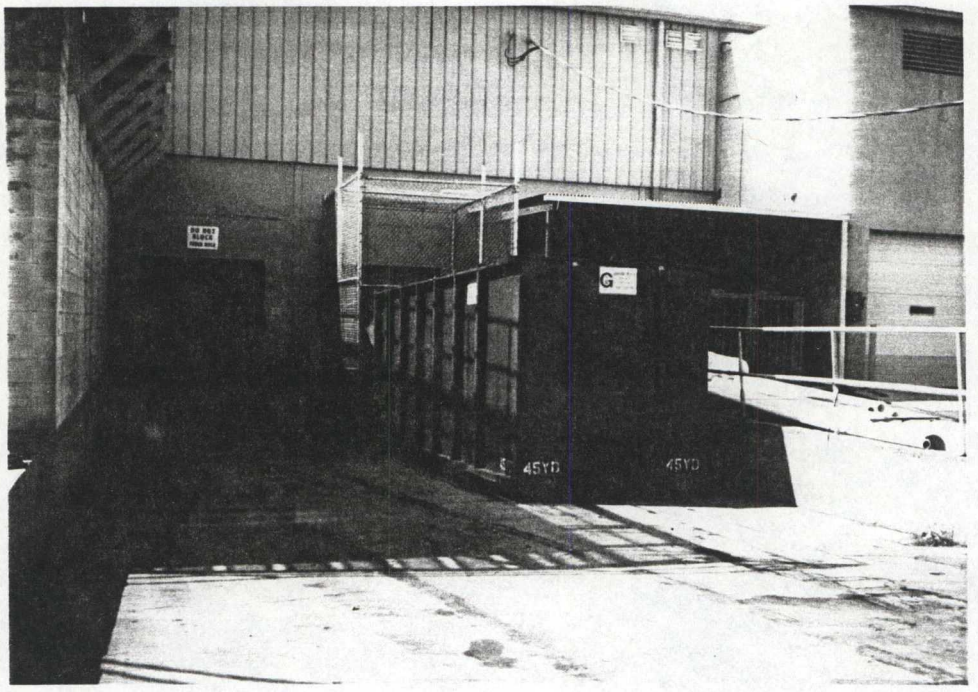
Photograph No. 4 Location: SWMU 2
Orientation: East Date: 08/07/91
Description: Spills from the shredding process go into this trench drain and are pumped into 55-gallon drums.



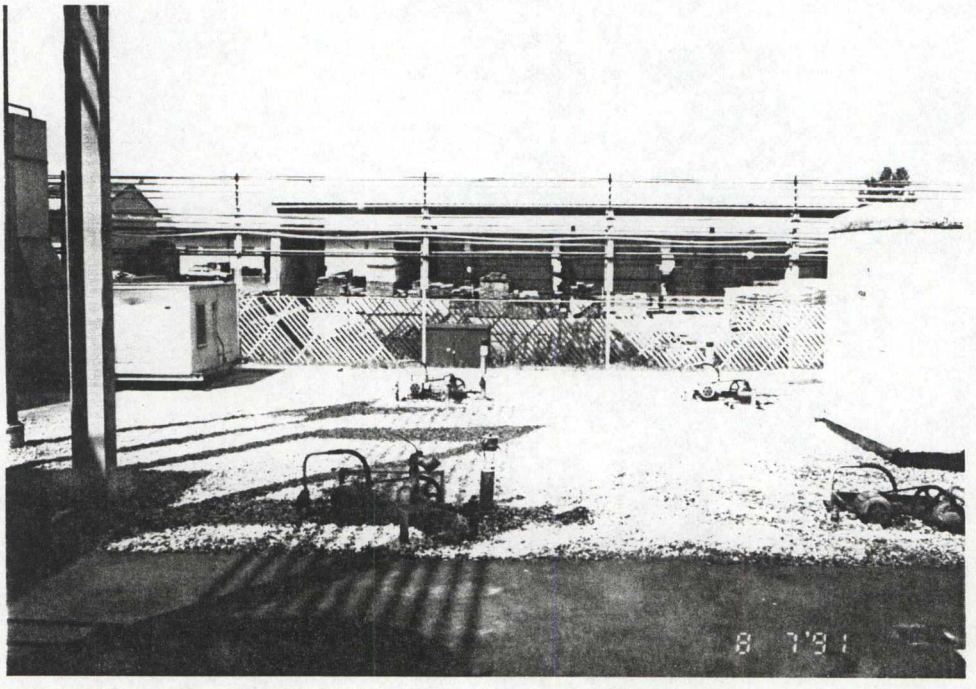
Photograph No. 5 Location: SWMU 2
Orientation: Southeast Date: 08/07/91
Description: Hazardous waste drum storage area; the yellow line depicts the 50-feet minimum distance from the property line that all hazardous waste must be maintained within.



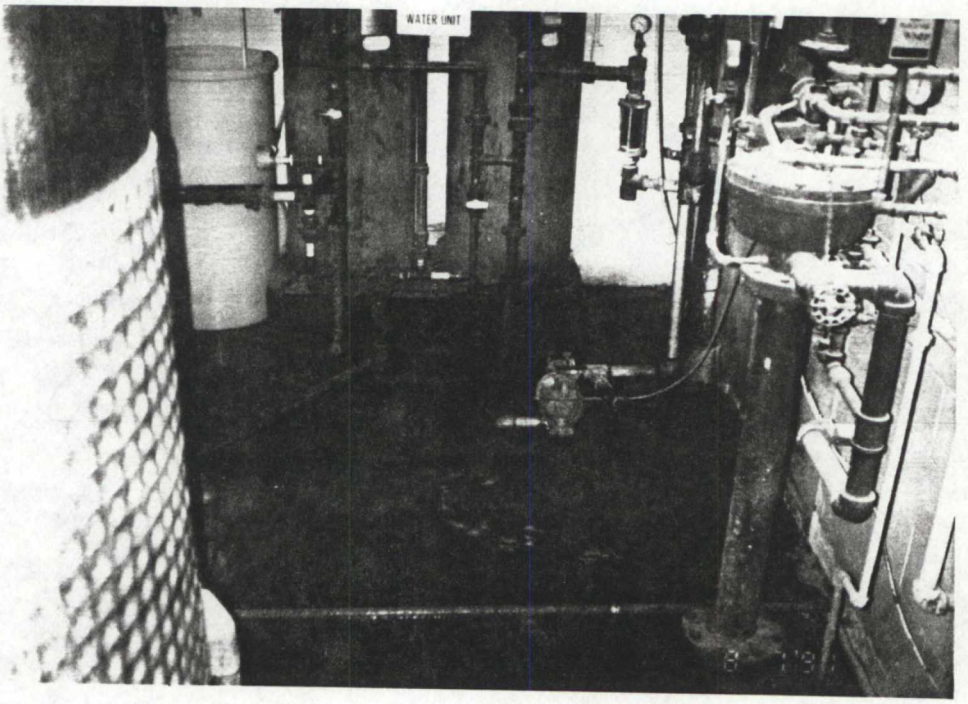
Photograph No. 6 Location: SWMU 2
Orientation: Northeast Date: 08/07/91
Description: Overall view of aerosol can shredder with drum storage area.



Photograph No. 7 Location: SWMU 3
Orientation: South Date: 08/07/91
Description: Trash compactor 45-cubic-yard bin is located on a concrete loading dock with a gravel-lined trench for drainage. Compactor unit is entirely fenced in.



Photograph No. 8 Location: AOC 1
Orientation: West Date: 08/07/91
Description: Area over the underground raw chemical storage tanks.



Photograph No. 9 Location: SWMU 1
Orientation: South Date: 08/07/91
Description: Line one compounding room pit; 24- by 24- by 18-inches deep. Pit drains into SWMU 1 unless 1,1,1-trichloromethane solvent is used; then pit is pumped out overhead into 55-gallon drums.

Photograph No. 10 Location: Retention Pond
Orientation: Northwest Date: 08/07/91
Description: Accra Pac's retention pond, located on the north end of the facility adjacent to SWMU 2, is completely fenced. No signs of oil or foreign matter present.

ATTACHMENT B

VISUAL SITE INSPECTION FIELD NOTES

Accra-Pac counsel — Wed 8/7/91

8:00 Larry McHugh, Robert J., Debra Shafer, Judy H. Arrive at site at 8:00 and meet in conference room with above 4 people.

Contract manufacturing:
- formulate products from raw chemicals
- automotive, personal, health products

Wastes
- unacceptable finished product
- residuals of products
- residual from filling equip.

all batch processes.

Raw products
- isopropyl alc.
- deal with hundreds of seperate chemicals.

tank and line washing
- water
- isopropyl alc. for anhydrous.

- Can shredding and drum storage (cans recycled) 40% of all cans contained area (dike) w/ concrete sump that lathes pumps waste into drums
- 4 drums of waste from shred. a week
- products are separated and determined if Haz W. or not. (50%)
if not → city sewer
if so → off site for testing
- SIU permit for Elkhart city sewer. good til 3/95
- for shredder
10,000 gal tank (2)
- seams and joints and concrete are sealed

UST
1st one baffled and agitated to prevent settling then overflow to 2nd
Reason: to prevent a spill from going to the sewers.
(isolated and pumped out).
Required to do self monitoring test of tank contents.
Everything from production goes into tanks. (Ken Kesler - Engr. Mgr)

4 product lines
3 aerosal, 1 liquid
wastes go to tanks

Evaporators
closed when hallway put in.

tanks
solvents may be used in
line one because of ~~Freon~~ TDX.
1,1,1 trichloroethane does not go
to tanks, Close drains and
pump to drums.
Mostly water.
Gas house (Charging Room) and
Compounding area have pits
2'x2'x1½' for line 1.

Compounding areas: batch formulation
production lines: filling

Raw chemical storage - UST
Propellent Tank farm -
isobutane and propane

Old Retention - Closed in 1988,
leased by City for Road drainage

Unlined Pit - frozen in 1990,
drain plugged then and
after thaw - pumped out.
they don't know where it
was?

Warehouse on Turner Ave.
- used to store obsolete
products, virgin chemicals
- separate EPA ID#.
- fire there in 85 and 88.
- leased from Options, Inc.

1989 Waste Generated ~~by~~
report of 3,000 lbs.
Contaminated soil was from
old Accupak site where
fire occured in 1976.
Currently being cleaned up.

Larry could not find closure
plan for drum field closed
in 1985.

New tank farm proposed for North
of Tank farm and Removal
of Raw Material at ST
annual integrity tested. submitted to Elkart Co. HD
on 1988

Old Compacter - moved to
Shipping area, rubbish -
cardboard, plastic.
always on concrete and curbed
in 1978

Plant Built in 1978. grass
to east around old ret. area.
8.9 acres.
105,000 ft²
144,000 total w/ outside bldg.
290 employees. full time perm.
not include temporary.

9:45 tour.
- Compacto area
- old ret. pond.
- New " "
- Photo 1 NW of New Ret Pond.
- Phot 2 of Can shredder. North
Judy also took pic same as
Mike Keefe.
Barrels all marked, covered
Pumped on West side of pit
50 ft line from fence that -
Photo 3 can shredder east.

all Haz Waste must be maintained within

Photo 4 of Drum Storage
looking South
15 Non Haz drums.
38 Haz "

Photo 5 of pit for shredder East.
locked at night -
double locked and 24 hr. security
drums pumped to tankers for disposal by Jakacki (Chigo)
then drums recycled, not rinsed but less than 1 inch residue.

photo 6 of Compactor Southwest.
completely fenced (roof and all)
ram compaction
drain also goes to tanks
No observed stains.

2 shifts M-F manufacturing; 1 shift shredder

Line 4 drains for over the counter hair care left over batch goes into barrels

Line 3 liquid line.

Line 2 -

Line 1 - compound room

all supply lines are gpm control; auto shut off if flow too high (spill)

Raw UST - ground Clear, no visible contam.

Photo 7 North Raw UST

Photo 8 west Raw UST

Waste UST
Two pumps for safety
flow meter locked

Photo 9 Waste UST Southeast
Raw material storage over
old drum storage just north
of Waste UST

Propellent tank farm - clean

photo 10 North at Shredder

Waste oil info

RO Retentate goes to 10,000 tanks

1055 returns from tour

May 30 compliance insp. w/
IDEM brought about by
a compliant.
Done by Mike Wilhelm.

Copies
- ind. waste discharge Permit
- facility layout
- 3 of the shredder.
- Health care #ID
- tests of discharge.

Kitty Corner to Acralac is nearest
residence. 500 ft.

1125 drive out to old site
sold to Warner Baker.
CERCLA Site.
Weed grown over area

old concrete still
remains, loading dock

Photo 11 North over
center of site
2 well on site
semi fenced (fallen)

1130 leave site.
80°F Sunny, humid.

Get copy of CEI from May 30